

REGER RIZZO KAVULICH & DARNALL, LLP

By: **Richard M. Darnall, Esquire (RD 2726)**

800 Kings Highway North, Suite 203

Cherry Hill, New Jersey 08034

(856) 779-2799

Attorneys for Defendant, The Phillies (improperly plead as, "Philadelphia Phillies")

---

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY, CAMDEN VICINAGE**

---

Plaintiff,

JASON WILLIAMS

v.

Defendants,

PHILADELPHIA PHILLIES

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Civil Action No.: 05-cv-2346 (JHR)

**DEFENDANT, THE PHILLIES',  
NOTICE OF MOTION TO DISMISS  
AND/OR TRANSFER PLAINTIFF'S  
COMPLAINT PURSUANT TO  
F.R.Civ.P.12(b)(2)(3) and (6)**

**RETURNABLE: FRIDAY, JUNE 17, 2005**

**PLEASE TAKE NOTICE** that Defendant, The Phillies, will move this Court for an Order dismissing and/or transferring Plaintiff's Complaint pursuant to F.R.Civ.P.12(b)(2)(3) and (6) for the failure to state a claim upon which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, this Moving Defendant will rely upon the attached Memorandum of Law.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith. Oral argument is respectfully requested.

Respectfully submitted,

**REGER RIZZO KAVULICH & DARNALL, LLP**

**DATED:** Tuesday, May 24, 2005

**By:**

---

**RICHARD M DARNALL, ESQUIRE (RD 2726)**  
Attorneys for Defendant,  
The Phillies